

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC.,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

Re: D.I. [●]

ORDER DISALLOWING CLAIM NO. 10731 FILED BY LIPP CDS, INC.

Upon the objection (the “**Objection**”)² of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”) disallowing Claim No. 10731, filed by Lipp CDS, Inc. (“**Lipp CDS**”), pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rules 3001 and 3007, all as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and after any hearing and upon the record in

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms used but not otherwise defined herein shall have the meanings given to such terms in the Objection.

these Chapter 11 Cases; and after due deliberation; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is **SUSTAINED** as set forth herein.
2. Claim No. 10731, filed by Lipp CDS, is disallowed pursuant to section 502 of the Bankruptcy Code, based on the failure of Lipp CDS to demonstrate that it is owed funds under the Commission Agreement.
3. Kroll is authorized to update the claims register to reflect the relief granted in this Order.
4. Nothing contained in the Objection or this Order is intended to be or shall be construed as (a) an admission as to the validity of any claim against the Debtors or their estates, (b) waiver of rights to dispute the amount of, basis for, or validity of any claim, (c) a waiver of rights under the Bankruptcy Code or any applicable non-bankruptcy law, (d) an agreement or obligation to pay any claims, or (e) a waiver of any claims or causes of action which may exist against any creditor or interest holder.
5. Nothing in the Objection or this Order shall be construed as an allowance of any claim.
6. The Debtors' rights to amend, modify, or supplement the Objection, to file additional objections to the claims listed in the Objection or any other claims (filed or not) which have been or may be asserted against the Debtors or their estates, and to seek further reduction of any claim, are preserved. Additionally, should the grounds of an objection stated in the Objection be dismissed, the Debtors' right to object on other stated grounds or any other grounds that the Debtors discover during the pendency of these Chapter 11 Cases are preserved.

7. This Order shall be immediately effective and enforceable upon its entry.
8. The Debtors, Kroll, and the Clerk of this Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
9. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.